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Attorneys for Defendant
TAISHEWY TOBET RICE

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

TAISHEWY TOBET RICE,

Defendant.

Case No. 8:19-cr-00008-JLS

**EXHIBIT A IN SUPPORT OF
SENTENCING**

Defendant Taishevy Tobet Rice by and through counsel, hereby submits Exhibit A
in support of sentencing.

Respectfully submitted,

CUAUHTEMOC ORTEGA
Federal Public Defender

DATED: May 30, 2024

By: s/ Mara González Souto

MARA GONZÁLEZ SOUTO
Deputy Federal Public Defender

EXHIBIT A

FEDERAL PUBLIC DEFENDER
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Direct Dial: (213) 894-1896

May 29, 2024

To: Mara Gonzalez Souto
From: Raquel Chavez, LCSW

Re: **Taishewy Tobet Rice Release Plan**

In my capacity as a social worker at the Federal Public Defender's Office, you have asked me to prepare a release plan for Taishewy Tobet Rice. The purpose of this release plan is to outline the resources and structures that are available to Ms. Rice in the community.

I have developed the following plan based on my formal social work training, as well as years of experience providing social services to adults with substance use and mental health diagnoses. I am a registered Licensed Clinical Social Worker (LCSW 114068) with the California Board of Behavioral Sciences.

RELEASE PLAN

Mental Health

Ms. Rice disclosed that she has been diagnosed with a serious mental illness (SMI), bipolar I disorder, that she has a rich insight into. She knows that she needs medication to treat her symptoms and knows signs that indicate when she feels manic and depressed. Ms. Rice is currently taking medication to treat her symptoms while at West Valley Detention Center and was receiving outpatient therapy and psychiatry from AltaMed in the community.

Because of Ms. Rice's mental health diagnosis, she is eligible to receive mental health treatment by Los Angeles County Department of Mental Health's (DMH) program called Full Service Partnership (FSP). FSP is a community-based treatment program for adults who have been diagnosed with a severe mental illness and would benefit from an intensive service program. FSP utilizes a "whatever it takes" and client-driven approach to the work. The FSP program assists

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with housing, employment and education in addition to providing mental health services. FSP clients work with a therapist and case manager and have access to a psychiatrist, if needed.

FPD social worker will submit FSP referral upon release and coordinate warm hand-off with the assigned FSP provider.

DMH - Full Service Partnership
Service Area 8 Navigation Team
(562) 684-4512

Substance Use Treatment

Ms. Rice has a long history of using substances. Most recently her primary substance she uses is methamphetamine. Ms. Rice disclosed daily methamphetamine use, though she shared that she had stopped using about 1 month before her arrest. In 2023, Ms. Rice dealt with the traumatic passing of her boyfriend, Reuben. Ms. Rice shared that she had helped Reuben get admitted to the hospital due to concerning symptoms he was exhibiting. The hospital quickly discharged him to Ms. Rice. While Ms. Rice was at home with Reuben, she continued to witness concerning symptoms and Reuben ended up dying at home with Ms. Rice. Ms. Rice felt that Reuben didn't receive adequate care at the hospital and that this was a contributing factor to her boyfriend, who she shared was in relatively good health, passing away.

Reuben, was Ms. Rice's support system, along with her adult daughter. She had a difficult time coping with this loss and started using substances again in an effort to manage her grief. Ms. Rice wants to learn other ways of coping with her emotions and believes residential treatment would allow her to do that. Though Ms. Rice has had opportunities to complete residential treatment in the recent past, she has struggled to make the difficult first step of prioritizing treatment given the multiple stressors in her life, as well as locating a dual diagnosis treatment program that would meet her mental health and substance use needs.

Ms. Rice can be screened by the Los Angeles County Department of Public Health substance use treatment navigation service called Client Engagement and Navigation Services (CENS). CENS will screen for the appropriate level of treatment and secure an intake appointment at a dual-diagnosis program.

CENS
Clara Shortridge Foltz Criminal Justice Center
210 W Temple St
Los Angeles, CA 90012
(213)744-0724

Housing

Ms. Rice is in need of permanent housing and believes moving to Los Angeles County would be beneficial for her mental health and provide her more robust resources to become stabilized. She was evicted from her apartment in Fullerton and became homeless soon after. Ms. Rice can be connected to interim housing through FSP and eventually get connected to permanent housing

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through her FSP provider, which could include independent housing with a Section 8 voucher, project-based permanent supportive housing, or sober living.

Medical

Ms. Rice has multiple chronic medical conditions including diabetes and high blood pressure. Ms. Rice takes medication to manage her medical conditions and wants to continue to receive medical treatment through AltaMed. AltaMed health centers allow patients to receive everything in one place, including doctors, tests, treatments, and pharmacies. Ms. Rice can transfer her care to an AltaMed location nearest to where she gets released.

AltaMed
(888) 499-9303

Public Benefits

Ms. Rice has received Supplemental Security Income (SSI) in the past, but it was deactivated when she was incarcerated. Ms. Rice applied for SSI in 2018 when she was released and believes her SSI remains pending. FPD social worker can assist Ms. Rice with navigating the Social Security Administration and, if needed, reapply for SSI so that she can have funds to meet her basic needs.

Ms. Rice was receiving CalFresh, General Relief, and Medi-Cal prior to her arrest. Ms. Rice can continue to receive these public benefits upon her release. Ms. Rice can complete the disability waiver in order to exempt her from any time limits to her General Relief cash aid.

Department of Public Social Services
(866) 613-3777

Employment & Education

Ms. Rice has received vocational training in child development and wants to continue her education by working towards a certificate in human resource management. Ms. Rice identified a certificate program at Fullerton College that she wishes to pursue upon her release. Fullerton College is part of the Rising Scholars program. Rise Scholars program is committed to providing holistic and student-centered support for formerly incarcerating and systems impacted students, empowering them to take agency in achieving and exceed their goals through sustainable access to higher education.

Fullerton College
Rising Scholars
321 E Chapman Ave
Fullerton, CA 92832
(714) 992-7097

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Basic Needs

Ms. Rice is in need of clothing. Ms. Rice's belongings were at a storage facility that she was unable to pay and has since lost possession of. Clothing distribution events in Los Angeles and Orange County can be found at this website: <http://www.clothingthehomeless.org/>

Conclusion

As a social worker at the Federal Public Defender's Office, Social Support Unit, I will continue to assist Ms. Rice with accessing the resources mentioned above to work towards greater stability in the community and criminal justice compliance.

Sincerely,

/s/ Raquel Chavez

Raquel Chavez, LCSW, Social Worker